



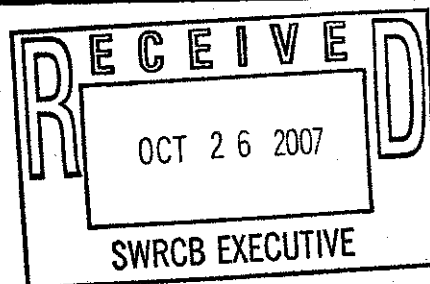
County Waterworks District No. 8 City of Simi Valley

12/4/07 Bd. Mtg.
Water Recycling Policy
Deadline: 10/26/07 Noon

2929 Tapo Canyon Road, Simi Valley, California 93063 (805) 583-6700

October 26, 2007

Ms. Jeanine Townsend
Acting Clerk to the Board, Executive Office
State Water Resources Control Board
P. O. Box 100
Sacramento, CA 95812-0100



SUBJECT: COMMENTS REGARDING THE PROPOSED WATER RECYCLING POLICY

Dear Ms. Townsend:

The Ventura County Waterworks District No. 8 (District) has reviewed the draft resolution to adopt the proposed Water Recycling Policy (Policy) that was presented and discussed in the workshop session and hearing conducted by the State Water Resources Control Board (SCWRB) on October 2, 2007 and is submitting comments regarding the proposed Policy.

The California Legislature is encouraging recycled water use to supplement existing surface water and groundwater supplies to meet a growing water demand in the State. The District agrees with the SCWRB's approach to establish a Policy to encourage the development of recycled water facilities by standardizing requirements for recycled water irrigation projects and groundwater recharge reuse projects to facilitate the review and approval process by the various Regional Water Quality Control Boards. However, some of the standardized provisions in the proposed Policy are not supportive of recycled water use and will discourage or prohibit the development of appropriate recycled water projects.

DISTRICT COMMENTS

Paragraph 7 (d)

The District finds that Paragraph 7 (d) of the proposed Policy, which would limit the monthly average concentration of total dissolved solids (TDS) in the recycled water to not exceed the potable source water supply plus 300 milligrams per liter (mg/L) for recycled water irrigation projects, is not appropriate.

Although the proposed Policy attempts to balance the benefits of recycled water use with protection of water quality and beneficial use of local groundwater resources, such a provision implies that recycled water irrigation projects are recycled water recharge projects, which they are not. Actual recharge from large irrigation use as proposed by such projects is incidental and extremely small in percentage compared to other recharge sources. TDS that is added to

the geologic formation that may leach to groundwater below will not be of sufficient quantity to materially increase the TDS concentration of any incidental recharge from irrigation or precipitation in the long term. Recycled water irrigation supply that meets drinking water standards will certainly not impair the water quality or beneficial use of any underlying groundwater. Furthermore, the recycled water irrigation supply must also meet customer standards, which essentially imposes a market-based standard for producers.

Even for recycled water recharge projects, this provision would be unnecessarily and arbitrarily restrictive. Such recharge projects should be evaluated on a case-by-case basis to determine if water quality and beneficial use of the underlying groundwater supply would be impaired.

Paragraphs 10 and 11

The District feels that the California Department of Public Health (DPH) should be the agency responsible for regulating and setting standards for all constituents involved with recycled water use to protect public health for all beneficial uses including agricultural use. The DPH establishes Maximum Contaminant Levels (MCLs) and has the ability to set interim standards such as State Action Levels that would be based on health risk assessments for any constituent not having an MCL. The DPH has the expertise and will provide a consistent approach with regard to establishing water quality standards.

Paragraphs 17 and 18

The District feels that Paragraphs 17 and 18, which establish liability for agencies involved with water recycling use, are not appropriate for this proposed Policy since provisions for such liability are already established under existing State law.

General

For easier use, the proposed Policy should be reorganized to have one section with provisions applicable for recycled water irrigation projects and one section with provisions applicable for recycled water recharge projects.

IMPACT OF PROPOSED WATER RECYCLING POLICY TO THE DISTRICT

The District is currently planning and evaluating a recycled water distribution system project to deliver tertiary-treated recycled water to customers with large irrigation demand in the western portion of the City of Simi Valley. The project being considered would supply an average of 750 acre-feet per year (AFY) of recycled water for irrigation purposes and can be expanded to supply nearly 1,100 AFY. The project is technically viable and marginally feasible from an economic standpoint. The recycled water supply meets all drinking water standards with TDS concentrations ranging from 560 to 850 mg/L. The project is for recycled water irrigation,

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and any incidental recharge to the underlying groundwater basin will not impair its quality or potential for beneficial use as the groundwater already exceeds drinking water standards for TDS such that treatment would be required for its potable use. Although the project provides the benefit of reducing the District's demand for imported water supplies and does not have the potential to impair the quality or beneficial use of any underlying groundwater, the project would not comply with the proposed Policy as it is currently drafted since the source of potable supply has TDS concentrations that range from 230 mg/L to 330 mg/L. Thus, the impact of the current proposed Policy to the District, as well as other agencies with similar recycled water irrigation projects, is severe.

In closing, the District supports the Board's efforts to bring forward a consistent policy that will encourage recycled water use. We appreciate the opportunity to provide you with comments that will help achieve the State's objectives and encourage the development of recycled water projects that can be rationally shown to be protective of other sources of water supply for potable and other beneficial uses.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy P. Nanson", written over a horizontal line.

Timothy P. Nanson
Director of Public Works

cc: Assistant Director of Public Works/J. Deakin
Principal Engineer/Waterworks/E. Wong
Plant Operations Manager/J. Langley
Principal Engineer/Sanitation/M. Kang